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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF JESSICA BANSAL IN
SUPPORT OF SUPPLEMENT TO
MOTION FOR COMPLIANCE [ECF 286]**

1 Additional Counsel for Plaintiffs

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1 I, Jessica Karp Bansal, declare:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am an attorney with the National Day Laborer Organizing Network and counsel of
4 record in this action for Plaintiffs. I have personal knowledge of the facts set forth in this declaration
5 and, if called as a witness, I could and would testify competently thereto.

6 2. Very early this morning, September 10, 2025, I began to receive messages from
7 people on the east coast saying that the USCIS website was no longer permitting them to register
8 Venezuelans for TPS, even though the registration deadline did not expire until the end of September
9 10, 2025. Throughout the day, I have continued to receive such messages. I and my co-counsel
10 received more than a dozen such messages from a combination of Venezuelan TPS holders, other
11 members of the Venezuelan and TPS holder communities, private attorneys, and immigration legal
12 service providers. Several of the messages also attached screenshots showing the website's list of
13 countries for which one could re-register, with Venezuela absent from the list.

14 3. At 7:27 a.m. PT this morning I wrote to Defendants' counsel William Weiland to
15 inform him of this development. *See Ex. A* (a true and correct copy of my email to Mr. Weiland). I
16 asked that Defendants re-open the registration period for "at least 24 hours, starting today," and that
17 they provide us with "at least 4 hours advance notice" so that we could inform members of the
18 Venezuelan TPS community and the lawyers who work with them in order to ensure that people are
19 permitted to register as this Court's order requires.

20 4. As of the time of this filing, Mr. Weiland has not responded.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 Executed on September 10, 2025, in Claremont, California.

24
25 /s/ Jessica Karp Bansal

26 Jessica Karp Bansal
27
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